

# Exhibit F

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA

GREGORY GOODWIN

Plaintiff,

-vs-

ACCURIDE ERIE, LP

Defendant.

Civil Action  
No. 05-161

CERTIFIED TRANSCRIPT

DEPOSITION OF: MICHAEL PINSON

DATE: June 28, 2006  
Wednesday, 9:00 a.m.

LOCATION: 150 East 8th Street  
Erie, PA

TAKEN BY: Plaintiff  
Gregory Goodwin

REPORTED BY: Cynthia A. Hawley  
Notary Public  
AKF Reference No. CH95362C

1           been on the job about a month.

2                       And he came to me. He didn't  
3 understand. We were, they were down almost the  
4 entire shift. Didn't, wasn't sure how to  
5 account for it. He didn't understand what the  
6 equipment was doing. Dave had to come in that  
7 morning and fix it and pulled up the MAC MAN  
8 report and looked at it.

9                       And Dave was our expert in terms of  
10 interpreting that. And he was puzzled by some  
11 of the moves. But we didn't make any  
12 conclusions one way or the other about what  
13 that might have meant.

14 Q.       Eventually you must have made some conclusions  
15 about what those moves meant?

16 A.       I don't think we necessarily did.

17 Q.       Well then why did you terminate Mr. Goodwin?

18 A.       We terminated Mr. Goodwin because he was  
19 slowing down the robot speeds, because he's a  
20 disruptive force on the shop floor telling  
21 employees let's fuck Accuride, giving the  
22 junior employees a hard way to go about signing  
23 up for overtime.

24 Q.       Are there any reasons other than the reasons  
25 given in your letter, which was previously

1 marked in Mr. Goodwin's deposition as  
2 Deposition Exhibit 18? I would assume those  
3 are the reasons Mr. Goodwin was terminated?

4 A. Yes.

5 Q. Certainly one of those reasons in there is  
6 contributing to a work slow down/stoppage,  
7 correct?

8 A. Yes.

9 Q. And you've already said that the production  
10 data in and of itself doesn't really tell you  
11 whether there was or was not a work slow down,  
12 correct?

13 A. Correct.

14 Q. Neither for that matter does the MAC MAN data  
15 regarding moves made on the lathe, isn't that  
16 right?

17 A. Just tells you what moves were made.

18 Q. Yeah. Doesn't tell you whether that amounted  
19 to a slow down or stoppage, does it?

20 A. No.

21 Q. And also given the fact that neither you nor  
22 anybody else apparently in management bothered  
23 to ask Mr. Goodwin what reasons, if any, he had  
24 for those moves, even to this day. You don't  
25 know what reasons Mr. Goodwin may have had for

1 didn't you?

2 A. Yes, I've seen the production data.

3 Q. I don't know if you remember, but I mean,  
4 certainly you can look at the production data  
5 and see that on the day in question back in  
6 March of 2004 when Mr. Bruno felt compelled to  
7 send Ms. Gore home, the result was that they  
8 could only run one of the two lines?

9 MR. SAUNDERS: Objection. That's not  
10 the testimony.

11 BY MR. CHIVERS:

12 Q. Do you know that, sir?

13 A. No, I do not know that.

14 Q. You could look at the production data and  
15 determine that, couldn't you?

16 A. I spoke to Jerry Bruno. Jerry said they got  
17 somebody from somewhere else in the plant and  
18 they ran both lines.

19 Q. Hmm. Okay. All right. Did you bother to look  
20 at -- you just accepted what Mr. Bruno said?

21 A. There were wheels produced on both lines that  
22 night.

23 Q. You've been able to determine that by looking  
24 at the data yourself?

25 A. Yes.

1 Q. Okay. Anyway, taking a look at this Deposition  
2 Exhibit 18 from Mr. Goodwin's deposition, fair  
3 to say, sir, that all those reasons given there  
4 were integral to the termination?

5 A. I think so, yes.

6 Q. All right. I'm going to take two minutes, talk  
7 to my client. Okay?

8 A. All right.

9 - - - -

10 (There was a discussion off the record.)

11 - - - -

12 MR. CHIVERS: I have no more  
13 questions.

14 - - - -

15 EXAMINATION

16 - - - -

17 BY MR. SAUNDERS:

18 Q. I just have two. At the time that Mr. Goodwin  
19 was discharged on July 23rd of '04 had you  
20 received, did you know of the incident that  
21 Mr. Russo testified this morning to concerning  
22 the extended break?

23 A. Yes. I was aware of that.

24 Q. And had you received the, had you met and  
25 talked to a coworker of Mr. Goodwins by the

1 COMMONWEALTH OF PENNSYLVANIA ) CERTIFICATE

2 COUNTY OF ERIE ) SS:

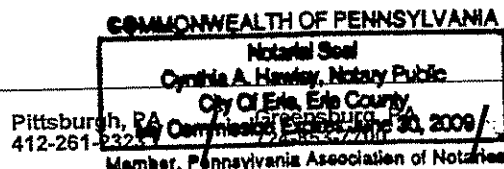
3 I, Cynthia A. Hawley, a Court Reporter and  
4 Notary Public in and for the Commonwealth of  
5 Pennsylvania, do hereby certify that the witness,  
6 MICHAEL PINSON, was by me first duly sworn to testify  
7 to the truth; that the foregoing deposition was taken  
8 at the time and place stated herein; and that the  
9 said deposition was recorded stenographically by me  
10 and then reduced to printing under my direction, and  
11 constitutes a true record of the testimony given by  
12 said witness.

13 I further certify that the inspection, reading  
14 and signing of said deposition were NOT waived by  
15 counsel for the respective parties and by the  
16 witness.

17 I further certify that I am not a relative or  
18 employee of any of the parties, or a relative or  
19 employee of either counsel, and that I am in no way  
20 interested directly or indirectly in this action.

21 IN WITNESS WHEREOF, I have hereunto set my hand  
22 and affixed my seal of office this 17th day of July,  
23 2006.

24 Cynthia A. Hawley  
25 Notary Public



Erie, PA  
814-453-5700

AKF